THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ACCU-SPEC ELECTRONIC SERVICES, INC. :
:
Plaintiff, :
: C.A. NO.: 03-394 E
v. :
:
CENTRAL TRANSPORT :
INTERNATIONAL, INC. and :
LOGISTICS PLUS, INC. :
:

DEFENDANT CENTRAL TRANSPORT INTERNATIONAL, INC.'S
RESPONSES TO PLAINTIFF'S REQUESTS FOR ADMISSIONS (FIRST SET)

Pursuant to Rule 36 of the Federal Rules of Civil Procedure, and the local Rules of Civil Procedure for the United States District Court for the Western District of Pennsylvania, the Defendant, Central Transport International, Inc. ("Central Transport") answers and objects to Plaintiff, Accu-Spec Electronic Services, Inc.'s. ("Accu-Spec") Requests for Admissions as follows:

GENERAL OBJECTIONS

1. Defendant objects to each of Accu-Spec's requests to the extent that those requests seek discovery beyond that permitted by the Federal Rules of Civil Procedure and/or the applicable local rules of this Court.

2. Defendant objects to each of Accu-Spec's requests to the extent they seek information protected from discovery by the attorney, privilege, the work product doctrine and/or other applicable privileges or discovery exemptions.

3. To the extent that the Defendant's investigation and discovery into this matter are continuing and ongoing, Defendant reserves the right to supplement, amend and/or modify their

discovery responses and/objections accordingly.

Subject to and without waiver of each of the foregoing general objections, which are incorporated by reference in response to each of Plaintiff's requests, Defendant responds to Plaintiff's Requests for Admissions as follows:

1. Attached to these Requests for Admissions are invoices from Dage Industries, Inc. to Accu-Spec Electronic Services, Inc. (Documents A116-A122 and A127-A129).

ADMITTED ____________ DENIED ___X_______

RESPONSE:

The attached documents are a collection of correspondence, receipts and invoices which speak for themselves. Specifically the document with a handwritten bates numbered A116 appears to be a cover letter from Paul Walter of Dage Precision Industries, Ltd. to Jim Mullen of Accu-Spec Electronic Services. The document bates numbered A117 appears to be a travel agent's invoice or receipt for rental of a vehicle. The document bates numbered A118 appears to be a receipt or invoice from a travel agent for a flight. The document bates numbered A119 appear to be receipts for food. The document bates numbered A120-121 appears to be a guest charges summary for a stay at the Courtyard Hotel, which also details various telephone charges. The document bates numbered A122 is a repair estimate prepared by Peter Dunn, as is the document bates numbered A127. The document bates numbered A128 and A129 are letters drafted by Peter Dunn to Jim Mullen. Because these documents are a compilation of various types of documents, including correspondence, receipts and invoices which speak for themselves this request for admission must be denied.

2. The invoices described in Requests for Admission 1 are authentic.

ADMITTED ____________ DENIED ____X________

RESPONSE:

As stated above in the response to Request for Admission No. 1, the compilation of documents includes documents which are not invoices, some estimates, correspondence and receipts. For this reason this request is denied. As far as their authenticity, Central Transport has no reason to believe that the documents attached are not authentic.

3. The charges represented by these invoices were reasonable.

ADMITTED ____________ DENIED ____X________

RESPONSE:

This request is objected to as it calls for a legal conclusion. This request is denied.

4. The repair work described in the invoices was reasonably required by the events alleged in the Complaint filed in the above-caption (sic) matter.

ADMITTED ____________ DENIED ____X________

RESPONSE: Central Transport denies many of the allegations in the Complaint, and denies that the documents attached to plaintiff's requests were all invoices, and therefore denies this request.

5. Accu-Spec has paid the amounts indicated on the attached invoices.

ADMITTED ____________ DENIED ___X_________

RESPONSE:

After reasonable inquiry, of information known or readily obtainable by Central Transport, Central Transport is unable to admit or deny this Request for Admissions.

Respectfully submitted,

JANSSEN & KEENAN P.C.

By: ______________________

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September 10, 2004

Attorneys for Defendant
Central Transport International, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Response to Plaintiff's Requests for Admissions (First Set) was served this 10th day of September 2004, via U.S. first class mail, postage prepaid, upon counsel listed below:

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